



THE CITY OF NEW YORK
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March 13, 2019

VIA ECF

Honorable Judge Raymond J. Dearie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: Lerin Pierce v. The City of New York et al.
16 CV 05703 (RJD) (RML)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing the sole remaining defendant, Officer Sonia Belardo, in the above captioned action. The re-trial in his matter is scheduled to begin on May 13, 2019. As such, defendant Belardo writes to request the Court endorse defendant's proposed schedule for all pretrial submissions.

On March 5, 2019, defendant provided the below schedule to plaintiff's counsel. Although plaintiff's counsel has indicated that he does not consent to defendant's proposed schedule, he has not provided any alternative dates to defense counsel. In order to complete the necessary pre-trial submissions before the final pre-trial conference scheduled for April 22, 2019 at 10:00 a.m. defendant proposes that Your Honor So Order the following deadlines:

- Plaintiff's portion of the Joint Pre-Trial Order to be provided to defendant: March 15, 2019
- Defendant's portion of the Joint Pre-Trial Order to be provided to plaintiff: March 29, 2019
- Motions *In Limine* to be served: April 8, 2019
- Opposition to Motions *In Limine* to be served: April 16, 2019
- Joint Pre-Trial Order and Motions *In Limine* to be filed: April 16, 2019
- Plaintiff's portion of the Request to Charge to be provided to defendant: April 19, 2019
- Joint Request to Charge to be filed: May 3, 2019
- Parties to Exchange Trial Exhibits: May 3, 2019

- Proposed Voir Dire to be filed: May 9, 2019

Thank you for your consideration therein.

Respectfully submitted,

/s/

Valerie E. Smith
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **VIA ECF**
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Daniella Nanau, Esq.
Attorneys for Plaintiff